

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

*Norfolk Division*

UNITED STATES OF AMERICA	)	<b>UNDER SEAL</b>
	)	
v.	)	CRIMINAL NO. 2:17cr <b>8</b>
	)	
	)	21 U.S.C. § 841(a)(1)
WALLACE BROWN,	)	Possess with Intent to Distribute
	)	Cocaine Base
Defendant.	)	(Count 1)
	)	
	)	18 U.S.C. § 924(c)(1)(A)
	)	Possess Firearm in Furtherance of a
	)	Drug-Trafficking Crime
	)	(Count 2)
	)	
	)	18 U.S.C. § 922(g)(1)
	)	Possess Firearm by Felon
	)	(Count 3)
	)	
	)	21 U.S.C. § 853 & 18 U.S.C. § 924(d)
	)	Criminal Forfeiture

INDICTMENT

January 2017 TERM – at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about March 21, 2013, at Chesapeake in the Eastern District of Virginia, the defendant, WALLACE BROWN, did unlawfully, knowingly, and intentionally possess with intent to distribute 28 grams or more of a mixture and substance containing cocaine base, commonly known as “crack” cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).)

COUNT TWO

On or about March 21, 2013, at Chesapeake in the Eastern District of Virginia, the defendant, WALLACE BROWN, did unlawfully, knowingly, and intentionally possess a firearm, that is, one Glock, Model 19, 9mm semi-automatic pistol, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States including, but not limited to, possess with intent to distribute cocaine base in violation of 21 U.S.C. § 841, as charged in Count One of this Indictment.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

COUNT THREE

On or about March 21, 2013, at Chesapeake in the Eastern District of Virginia, the defendant, WALLACE BROWN, having been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting commerce a firearm, that is, one Glock, Model 19, 9mm semi-automatic pistol that had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).)

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER ALLEGES THAT:

1. The defendant, WALLACE BROWN, if convicted of any of the violations alleged in Counts One to Three of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition involved in or used in the violation.
2. The defendant, WALLACE BROWN, if convicted of the violation alleged in Count One of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2 and in addition to the property set out in paragraph one above:
  - a. Any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of the violations; and
  - b. Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations.
3. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).
4. The property subject to forfeiture includes, but is not limited to, the following property:
  - a. One (1) Glock, Model 19, 9mm caliber semi-automatic pistol, Serial Number MFL940.

(In accordance with Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d); and Title 28, United States Code, Section 2461.)

*United States v. Wallace Brown,*  
CRIMINAL NO. 2:17CR 8

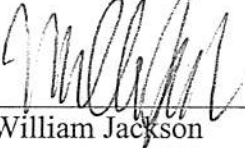
A TRUE BILL

*Redacted*

FOREPERSON

DANA J. BOENTE  
UNITED STATES ATTORNEY

By: \_\_\_\_\_

  
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